

FILED

UNITED STATES DISTRICT COURT

for the

SEP 26 2018

Southern District of Texas

David J. Bradley, Clerk of Court

United States of America)

v.)

1. Manuel NAVA)
2. Armando SERNA)
3. Jose SANCHEZ-COY)

Case No. B-18-896-MJ

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 20, 2018 in the county of Cameron and Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

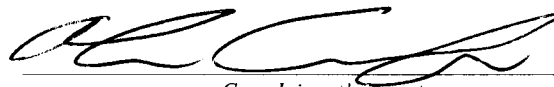
18 U.S.C. § 924(a)(1)(A)
18 U.S.C. § 371

Offense Description

The defendants knowingly conspired to make a false statement or representation with respect to the information required by this chapter to be kept in the records of a person licensed under this chapter, which firearm had been shipped or transported in interstate or foreign commerce to wit: one (1) DPMS rifle, model A-15, caliber 5.56 with serial number: F006298 and one (1) DPMS rifle, model Panther, caliber 5.56 with serial number: FFH230205.

This criminal complaint is based on these facts:

See Attachment A

☒ Continued on the attached sheet.

Complainant's signature

Adrian Cavanaugh Special Agent ATF

Printed name and title

Sworn to before me and signed in my presence.

Date: 09/26/2018



Judge's signature

City and state: Brownsville, Texas

United States Magistrate Judge Ronald G. Morgan

Printed name and title

Attachment A

On September 20, 2018, Manuel NAVA purchased the aforementioned firearms from Danny's Pawn and Sporting Goods, a Federal Firearms Licensee (FFL) in McAllen, Texas.

On September 21, 2018, your affiant interviewed Manuel NAVA who confessed to making a false statement as to being the actual purchaser of the firearms on the ATF Form 4473, at Danny's Pawn and Sporting Goods. NAVA confessed that in truth and in fact, he purchased the firearms on behalf of Armando SERNA and an individual later identified as Jose SANCHEZ-COY.

NAVA stated he was asked by SERNA to purchase a firearm on his behalf to which NAVA agreed. NAVA stated on September 20, 2018, SERNA, accompanied by SANCHEZ-COY picked him up at his residence in Harlingen, Texas, and drove them to Danny's Pawn and Sporting Goods in SERNA's vehicle. Once there, SANCHEZ-COY provided him with money and showed him which firearms to purchase.

Upon the completion of the sale, NAVA stated he placed the firearms in SERNA's vehicle and returned the remaining money to SANCHEZ-COY. NAVA stated he was then paid \$100.00 by SANCHEZ-COY and driven back to his residence. NAVA stated that upon arriving at his residence, he exited the vehicle and left the firearms with SERNA, and SANCHEZ-COY.

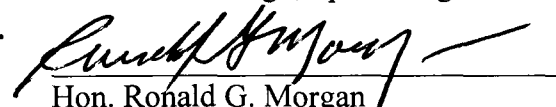
On September 25, 2018, your affiant interviewed Armando SERNA regarding NAVA's firearm purchase. SERNA stated he was asked by SANCHEZ-COY if he (SERNA) had a friend who could purchase firearms. SERNA stated he then asked NAVA to purchase firearms on his behalf, to which NAVA agreed.

SERNA then stated on September 20, 2018, he picked up SANCHEZ-COY and NAVA in his vehicle and drove them to the aforementioned FFL. SANCHEZ-COY then provided NAVA with money to purchase the aforementioned firearms. Upon the completion of the sale, SERNA provided transportation for NAVA and SANCHEZ-COY back to their residences.

On September 25, 2018, Jose SANCHEZ-COY was interviewed by ATF agents regarding NAVA's firearms purchase. SANCHEZ-COY stated he asked NAVA to purchase firearms on his behalf to which NAVA agreed. SANCHEZ-COY stated that on the day of the purchase, he was picked up by SERNA, who then picked up NAVA, and transported them all to the aforementioned FFL. SANCHEZ-COY stated that upon arriving at the FFL he provided NAVA with money to purchase the two aforementioned firearms. Upon completion of the sale, SANCHEZ-COY was provided with the firearms from NAVA and NAVA was paid approximately \$100.00 for each firearm purchased.

SWORN AND SUBSCRIBED before me
this 26th day of September, 2018.


Adrian Cavanaugh, Special Agent ATF


Hon. Ronald G. Morgan
United States Magistrate Judge